

EXHIBIT V

1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JEAN LAWNICZAK,)
Personal Representative)
of the ESTATE OF JOHN) Civil Action
ORLANDO, Deceased,) No. 2:17-cv-00185
Plaintiff,)
vs.)
ALLEGHENY COUNTY, et al.)
Defendants.)

DEPOSITION OF JEAN LAWNICZAK,

Friday
January 26, 2018

ELECTRONIC DISTRIBUTION, FORWARDING OR
REPRODUCTION OF THIS TRANSCRIPT IS PROHIBITED
WITHOUT AUTHORIZATION FROM THE CERTIFYING
AGENCY.

AMENT & AMENT
Court Reporting, LLC - Phone 412-793-6152

2

DEPOSITION OF JEAN LAWNICZAK,

a Plaintiff herein, called by the Defendants
for examination, taken pursuant to the Federal
Rules of Civil Procedure, by and before
Diane G. Galvin, a Certified Professional
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania, at the Allegheny
County Law Department, 445 Fort Pitt Boulevard,
Suite 300, Pittsburgh, Pennsylvania, on Friday,
January 26, 2018, at 10:01 a.m.

COUNSEL PRESENT:

For the Plaintiff:

Law Offices of Joel Sansone
by: MASSIMO A. TERZIGNI, ESQUIRE
Three Gateway Center, Suite 1700
Pittsburgh, Pennsylvania 15222
(412) 281-9194
Terzignim@gmail.com

For the Defendants:

Allegheny County Law Department
by: JOHN A. BACHARACH, ESQUIRE
300 Fort Pitt Commons Building
445 Fort Pitt Boulevard
Pittsburgh, Pennsylvania 15219
(412) 350-1150
John.bacharach@alleghenycounty.us

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1

I N D E X

2

3

WITNESS: JEAN LAWNICZAK

4

E X A M I N A T I O N: P A G E

6

BY MR. BACHARACH: 4

8

9

E X H I B I T S: P A G E

11

NO EXHIBITS MARKED

13

14

15

16

17

18

19

20

21

22

23

24

25

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

4

1

P R O C E E D I N G S

3

4

JEAN LAWNICZAK,

a Plaintiff herein, having been first duly
sworn, was examined and testified as follows:

E X A M I N A T I O N

BY MR. BACHARACH:

Q. Could you just state your full name
for the record, please.

A. My name is Jean Lawniczak.

Q. Ms. Lawniczak, I'm John Bacharach
and I'm representing Allegheny County and the
other defendants in the lawsuit that you filed.

I'm sure your attorney probably went
over it, but just a few basic ground rules, the
main one being, if you don't understand the
question that I ask, just let me know and I'll
either repeat it or rephrase it. You know,
this is a pretty informal proceeding. If you
feel tired, or you just want to take a walk or
do anything, just say so. We'll take a break.

If you need to talk to your attorney
at any time, you know, you're free to do that.

If there's a question pending, you

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
2 should answer that question before you take a
3 break, but other than that, it's entirely up to
4 you.

5 The other thing that's more
6 important for the court reporter than for me is
7 to answer the questions verbally. I mean, we
8 all have a tendency to shake our heads or shrug
9 our shoulders if we don't know or things along
10 that line, but the court reporter has to take
11 down what we say.

12 Did you understand all of that?

13 **A. Yes.**

14 **Q.** Are you taking any medication or is
15 there anything that's affecting you today that
16 would prevent you from hearing the questions,
17 remembering things or anything of that nature?

18 **A. No.**

19 **Q.** I'll try to make this as brief as I
20 can and, you know, it's a bad situation, and
21 I'll try not to make it any worse.

22 Could you just tell me where you
23 reside at the present time?

24 **A. Right now I live in Stanton Heights.**
25 **My address is 1535 Simona Drive, Pittsburgh, PA**
AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

6

1 J. Lawniczak - by Mr. Bacharach

2 **15201.**

3 **Q.** Do you live there with anyone else?

4 **A. My husband, Ron.**

5 **Q.** Ron?

6 **A. Ronald, yes.**

7 **Q.** And what's his employment?

8 **A. He works for Alco Parking, Merrill**
9 **Stabile.**

10 **Q.** About how long has he worked for
11 them?

12 **A. About 34 years.**

13 **Q.** Are you employed?

14 **A. I am.**

15 **Q.** By whom?

16 **A. I work for Heinz History Center on**
17 **Smithfield and 12th. I've been there three**
18 **years.**

19 **Q.** What do you do for them?

20 **A. Housekeeping.**

21 **Q.** It's a good place to work?

22 **A. Yeah, not to clean though. It's a**
23 **lot of cleaning. But it's nice. It's a**
24 **beautiful place.**

25 **Q.** I know you were -- well, you were

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach

2 married previously?

3 **A. Yes, I was, to my son's father,**
4 **John Orlando.**

5 **Q.** And when was that marriage?

6 **A. Oh, geez. If I got to go by**
7 **numbers.**

8 **Q.** Ballpark. I don't care an exact
9 date.

10 **A. My son was born in '75. I was**
11 **married two or three years before I had him.**

12 **Q.** Okay.

13 **A. And then he was like four-and-a-half**
14 **when I split up with my husband.**

15 **Q.** Do you have any children, any other
16 children?

17 **A. No.**

18 **Q.** John was your only child?

19 **A. John is my only child.**

20 **Q.** Sorry.

21 Now, when did you marry your current
22 husband, Mr. Lawniczak?

23 **A. October 21, 1989.**

24 **Q.** So obviously, I presume John lived
25 with you when he was a young child?

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

8

1 J. Lawniczak - by Mr. Bacharach

2 **A. Yes, John -- he did.**

3 **Q.** And was there a period of time when
4 he -- at some point, did he move out of the
5 house?

6 **A. Yes.**

7 **Q.** Do you know about when, either his
8 age or a year?

9 **A. That's a hard one. I'm not sure.**

10 **Q.** Has he lived with you; that is,
11 resided with you within the last ten years?

12 **A. No.**

13 **Q.** And just within the last ten years,
14 where -- what area was he residing in?

15 **A. Etna, Sharpsburg.**

16 **Q.** Was he living with anyone?

17 **A. No. He had his own apartment.**

18 **Q.** Did John graduate from high school?

19 **A. No, he didn't, but I told John if he**
20 **was going to be wanting to quit school that I**
21 **demand that he go get a GED, which he did do.**
22 **He got a GED.**

23 **Q.** What high school did he go to?

24 **A. Peabody. He went to Taylor**

25 **Allderdice and to Peabody.**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
2 **Q.** And what year did he leave, tenth or
3 eleventh grade, something like that?
4 **A.** **Something like that, tenth or**
5 **eleventh grade, yes.**
6 **Q.** But eventually, at some point in
7 time, he got his GED?
8 **A.** **Yes.**
9 **Q.** After that?
10 **A.** **Right after that.**
11 **Q.** I'm sorry, I forgot -- what was your
12 maiden name?
13 **A.** **Swidowski.**
14 **Q.** Could you spell it?
15 **A.** **S-W-I-D-O-W-S-K-I.**
16 **Q.** Thank you.
17 **A.** **You're welcome.**
18 **Q.** After John left high school, was he
19 employed?
20 **A.** **Yes, he was, just I can't quite**
21 **remember what different jobs he had. Worked**
22 **for pizza places, would work like roofing,**
23 **landscaping, different odds and ends of jobs.**
24 **Q.** Were these all short-term jobs, a
25 few weeks or months or so?

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

10

1 J. Lawniczak - by Mr. Bacharach
2 **A.** **Pretty much so, I believe because of**
3 **John's mental health issues.**
4 **Q.** What, the jobs just didn't last?
5 **A.** **Didn't last, right.**
6 **Q.** I note John has at least one child,
7 correct?
8 **A.** **He does.**
9 **Q.** Is it just one?
10 **A.** **Yes.**
11 **Q.** And what's her name?
12 **A.** **Her name is Elena, E-L-E-N-A.**
13 **Q.** And what's the mother's name?
14 **A.** **Tiffany.**
15 **Q.** And what's her last name, do you
16 know?
17 **A.** **Coxon.**
18 **Q.** Is that C-O-X-O-N?
19 **A.** **Yes. And she prefers Elena's name**
20 **to be Elena Coxon Orlando.**
21 **Q.** Okay.
22 **A.** **And that's what her name is.**
23 **Q.** How long is Elena?
24 **A.** **Elena is nine years old. She was**
25 **nine on the 9th of December. Born in 2008.**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
2 **Q.** Do you get to see Elena very much?
3 **A.** **Oh, yeah. Yes, I do.**
4 **Q.** Where does -- Elena, I presume,
5 lives with Tiffany?
6 **A.** **Yes, she does.**
7 **Q.** Where do they live?
8 **A.** **They live, it's like considered**
9 **Verona, Oakmont. I don't know the street**
10 **address off by heart.**
11 **Q.** Do you know the street?
12 **A.** **But it's reasonably close.**
13 **I don't, because Tiffany moves a**
14 **lot.**
15 **Q.** Do you know a telephone number for
16 Tiffany?
17 **A.** **I do. I have it in my coat.**
18 **Q.** Thanks.
19 **A.** **Sure.**
20 **Q.** Take your time.
21 **A.** **Of course, I don't know it off by**
22 **heart.**
23 **Q.** Nobody knows any phone numbers
24 anymore.
25 **A.** **I always knew my mom's.**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

12

1 J. Lawniczak - by Mr. Bacharach
2 **Q.** Well, actually, I still know that
3 one.
4 **A.** **I turned my phone off because I**
5 **thought --**
6 **Q.** That's all right.
7 **A.** **Not that I'm that busy of a person,**
8 **but I did not want it to ring.**
9 **Q.** Don't worry about it.
10 **A.** **I have the little old flip-top**
11 **phone.**
12 **Q.** That's fine.
13 **A.** **And I know it's 412-290 but that's**
14 **all I remember.**
15 **Tiffany's telephone number is**
16 **(412) 290-6203.**
17 **Q.** To your knowledge, is Tiffany
18 employed?
19 **A.** **No. At the current time, no.**
20 **Q.** I saw another name that's a
21 Renee Rush. Do you know who Renee Rush is?
22 **A.** **I do know who she is. She was a**
23 **girl that said that Johnny was the father of**
24 **her child years ago, and she named him John**
25 **Louis, which my son's name is John Louis. But**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **I guess welfare took her mother and I, because**
 3 **she was 16 at the time, maybe 15, and -- to**
 4 **explain, long story short, they did blood**
 5 **tests.**
 6 **Q. Paternity?**
 7 **A. Paternity tests, yes, and Johnny was**
 8 **not the father. The baby was biracial, not**
 9 **that that means anything.**
 10 **Q. Was John ever married?**
 11 **A. No.**
 12 **Q. Was John ever in the military?**
 13 **A. No.**
 14 **Q. Do you know whether John had an**
 15 **order to pay support for Elena?**
 16 **A. Right before John passed away -- no,**
 17 **John passed away. Something came in the mail**
 18 **and it was papers for support, but John paid**
 19 **support every month on his own, out of his**
 20 **pocket. And I used to say to -- my husband and**
 21 **I would say to John, you should get her to sign**
 22 **something because, you know, if she would go to**
 23 **court, because he did give her \$200 a month for**
 24 **Elena. Never missed a beat from when she was**
 25 **born.**

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

14

1 J. Lawniczak - by Mr. Bacharach
 2 **Q. Did he pay that in cash or by check?**
 3 **A. In cash.**
 4 **Q. If he wasn't working, where would he**
 5 **get the money?**
 6 **A. John received SSI.**
 7 **Q. So he was getting Social Security**
 8 **Disability?**
 9 **A. Yes.**
 10 **Q. When did he start getting Social**
 11 **Security Disability?**
 12 **A. I don't remember. I mean, I**
 13 **couldn't give you a date as to when.**
 14 **Q. Okay. I'm not necessarily looking**
 15 **for a date. I mean, was it more than ten years**
 16 **ago, within the last five, if you know?**
 17 **A. I'd say at least ten years ago, yes.**
 18 **Q. Did he have an attorney to assist**
 19 **him in getting Social Security Disability?**
 20 **A. Not that I know of.**
 21 **Q. Did John have a physical health**
 22 **problem? I'm not talking about, you know,**
 23 **getting a cold or something like that or, you**
 24 **know, getting a couple stitches because he fell**
 25 **one time. But, I meant, any longer term**

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 chronic physical health conditions?
 3 **A. Physical, no.**
 4 **Q. Was he taking any medications that**
 5 **you're aware of?**
 6 **A. Before he passed away?**
 7 **Q. Yes, ma'am.**
 8 **A. Yes. He was taking a few different**
 9 **psych meds, yes.**
 10 **Q. So as far as you know that his**
 11 **physical -- he didn't have any significant**
 12 **physical health problems, but he did have some**
 13 **mental health problem; is that right?**
 14 **A. That's right.**
 15 **Q. What were the mental health problems**
 16 **that he had as you understand it?**
 17 **A. Depression, mood swings.**
 18 **Q. When did those first appear?**
 19 **A. I would say probably like when he**
 20 **was 20 years old.**
 21 **Q. Was there anything that you're aware**
 22 **of that precipitated those problems? I mean,**
 23 **some tragic event in his life, for example, or**
 24 **traumatic event in his life?**
 25 **A. No.**

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

15

1 J. Lawniczak - by Mr. Bacharach
 2 **Q. Was he being treated by any**
 3 **physicians or psychiatrists or psychologists?**
 4 **A. Yes, yes.**
 5 **Q. Do you know who they are?**
 6 **A. He had a few different ones. I**
 7 **would venture to say the most recent one, I**
 8 **believe her name was Michele Maloy. She was**
 9 **located, her office, on the North Side.**
 10 **Q. He had health insurance coverage**
 11 **through Medicaid or --**
 12 **A. Uh-huh.**
 13 **Q. But she was, Ms. Maloy was the most**
 14 **recent person that he was seeing?**
 15 **A. Yes.**
 16 **Q. But he had seen other people prior**
 17 **to that?**
 18 **A. Yes.**
 19 **Q. Do you know how often he would see**
 20 **someone for treatment?**
 21 **A. At least once a month.**
 22 **Q. Was he pretty regular?**
 23 **A. Yes. He would go. He would want to**
 24 **go, talk.**
 25 **Q. Other than Ms. Maloy, can you**

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 remember, just off the top, anybody else that
 3 he saw for mental health treatment?
 4 **A. No.**
 5 **Q.** Is Ms. -- I'm sorry.
 6 **A. That I can remember offhand, no.**
 7 **Q.** Is Ms. Maloy, do you know if she's a
 8 therapist? A psychiatrist? A psychologist?
 9 Do you know?
 10 **A. I think she's a psychologist.**
 11 **Q.** Had John ever been hospitalized for
 12 any mental health condition?
 13 **A. Yes.**
 14 **Q.** Do you know how often?
 15 **A. That's a hard call, because it would**
 16 **be different. Like no, I -- I don't recall how**
 17 **often per se.**
 18 **Q.** Was it more than once, though?
 19 **A. It was a couple of times, yes.**
 20 **Q.** Do you know which hospitals he was
 21 seen?
 22 **A. Western Psych.**
 23 **Q.** When he was there, do you know about
 24 how long he was there?
 25 **A. Like a couple weeks.**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

18

1 J. Lawniczak - by Mr. Bacharach
 2 **Q.** Do you have an idea of when the last
 3 time he was actually hospitalized?
 4 **A. It would be a good couple of years.**
 5 **Q.** In the last, just say the last
 6 couple years before this happened, could you
 7 give me an estimate of how often you would see
 8 him?
 9 **A. Daily.**
 10 **Q.** You saw him daily?
 11 **A. Oh, yeah. Talked to him every**
 12 **night. I was exceptionally close with my son.**
 13 **That's why this is all so hard. And I try to**
 14 **accept -- it's not going to go away. I miss**
 15 **him so much, I couldn't even tell you. But**
 16 **John and I were very close, very close.**
 17 **Q.** That's good. It doesn't often --
 18 frequently doesn't work that way with --
 19 **A. I didn't see him everyday, but I**
 20 **talked to him every day. I'd see him like**
 21 **twice, a couple times a week.**
 22 **Q.** So talked to him almost every day
 23 and see him around a couple times a week?
 24 **A. Yes.**
 25 **Q.** He would usually stop over to your

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 place, is that how --
 3 **A. Or I stop at his, uh-huh.**
 4 **Q.** Prior to the March 29 incident, had
 5 John ever, to your knowledge, attempted to
 6 injure himself?
 7 **A. Yes.**
 8 **Q.** How often had that happened?
 9 **A. It didn't happen often. It wasn't**
 10 **often.**
 11 **Q.** Did it happen more than once?
 12 **A. I believe it happened twice.**
 13 **Q.** Can you give me an idea of when
 14 those events happened?
 15 **A. The one time when he went into the**
 16 **hospital to get help at Western Psych, he did**
 17 **it at the hospital. And I was there and I knew**
 18 **it was happening. I was in the room when he**
 19 **was getting registered, and he went in the**
 20 **bathroom. And I said to the guards, I said,**
 21 **"He's taking too long in there. Go see if he's**
 22 **all right. He's taking too long in there."**
 23 **They went in and he was hanging himself. And**
 24 **they pushed me out of the bathroom, out of the**
 25 **room.**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

19

1 J. Lawniczak - by Mr. Bacharach
 2 **Q.** If you want to take a break or
 3 something, you know, feel free. You know, it's
 4 -- like I said, we're not in a race here.
 5 **A. I know.**
 6 **Q.** Just let me know, all right?
 7 **A. I'm all right.**
 8 **Q.** I know there's no good way to talk
 9 about this stuff, and I apologize.
 10 **A. No.**
 11 **Q.** When did that event happen,
 12 approximately?
 13 **A. I'm not sure. I'd say, venture to**
 14 **say maybe five, six years ago.**
 15 **Q.** So he was trying to get himself
 16 admitted into Western Psych, went into the
 17 bathroom and was -- when the guards went in
 18 after you talked to them, he was doing
 19 something to attempt to hang himself?
 20 **A. Yes.**
 21 **Q.** Was he hospitalized? I mean, were
 22 there any physical injuries at that time that
 23 required him to be hospitalized?
 24 **A. No, psychological.**
 25 **Q.** So it hadn't, his attempt hadn't

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 gone to the point where he had physically
 3 injured himself?
 4 **A. No.**
 5 **Q.** And you said there was another
 6 incident. Was that before this, this incident?
 7 **A. Yes.**
 8 **Q.** What happened there?
 9 **A. He was trying to think of -- he**
 10 **was -- the situation was that he was on the**
 11 **street fighting or something I remember, and he**
 12 **put a plastic bag on his head.**
 13 **Q.** Was this in the --
 14 **A. That was when he first started**
 15 **getting treatment for mental health issues.**
 16 **Q.** How did you find out that had
 17 happened?
 18 **A. It so happened that the police**
 19 **officer that came to there was my husband's**
 20 **father, and he called my husband.**
 21 **Q.** What was his name?
 22 **A. Art Lawniczak.**
 23 **Q.** Is Art, is he still living in that
 24 area?
 25 **A. Yes, he's still living.**
 AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **Q.** I presume he's retired now?
 3 **A. Oh, yeah. Long time.**
 4 **Q.** And I'm sorry. He was a police
 5 officer?
 6 **A. Yes.**
 7 **Q.** In?
 8 **A. Pittsburgh, Number 5 Police Station**
 9 **in East Liberty.**
 10 **Q.** So that incident happened in the
 11 City of Pittsburgh?
 12 **A. Yes.**
 13 **Q.** Do you know, where there any -- did
 14 they take him to the hospital?
 15 **A. Oh, yes. They did. They took him**
 16 **to the hospital.**
 17 **Q.** Do you know which one? Western
 18 Psych?
 19 **A. Western Psych.**
 20 **Q.** Were there any other incidents that
 21 you can think of, that you're aware of, where
 22 John tried to injure himself?
 23 **A. No.**
 24 **Q.** Did he ever -- this is hard, but did
 25 he ever say anything to you about intending to
 AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 hurt himself? Did he ever say anything like
 3 that to you, you know, that "I'm going to hurt
 4 myself," "I'm going to kill myself," or
 5 anything like that? Did he ever say that to
 6 you?
 7 **A. He'd tell me he didn't want to live**
 8 **no more sometimes.**
 9 **Q.** How often would that happen?
 10 **A. Not often.**
 11 **Q.** And again, without guessing, I'm not
 12 asking you to guess, is it something when you
 13 say "not often," like once a year, once every
 14 five years, is there some --
 15 **A. Once every five years. Like I say,**
 16 **it wasn't often.**
 17 **Q.** Was there something that you think
 18 precipitated him saying that?
 19 **A. I'm sure there was, something inside**
 20 **his head. You know, he'd get depressed and**
 21 **overwhelmed, like we all do. It just we know**
 22 **how to handle things differently than someone**
 23 **with mental health issues does.**
 24 **Q.** But there wasn't some specific event
 25 that would prompt him to do that --
 AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **A. No.**
 3 **Q.** -- that you're aware of?
 4 **A. That I'm aware of, no.**
 5 **Q.** And I'm thinking of something, for
 6 example, like I've seen it. He had a number of
 7 arrests and so forth.
 8 **A. Uh-huh.**
 9 **Q.** But that wasn't something that, in
 10 and of itself, would precipitate it or was it?
 11 **A. No.**
 12 **Q.** There's some indication in the
 13 records that John said at the time that he used
 14 or was addicted to some illegal drugs,
 15 non-prescription drugs, I should say. Is that
 16 something you had some awareness of?
 17 **A. Yes.**
 18 **Q.** Do you know how long that problem
 19 existed?
 20 **A. No.**
 21 **Q.** Was it more than -- was it ten years
 22 or more than ten years?
 23 **A. It was probably more than ten years.**
 24 **Q.** Do you have any idea what illegal
 25 drugs he was using aside from the prescription
 AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
2 drugs?
3 **A. Well, it usually stems from**
4 **prescription drugs, painkillers to heroin. He**
5 **used heroin.**

6 **Q.** Were you aware that he ever used,
7 for example, something like methamphetamine?

8 **A. No, he never used that. He never**
9 **used that. He was, how should I say, that**
10 **would be a speed thing. He -- no, he never**
11 **used that.**

12 **Q.** So your understanding is the drugs
13 he used were more opioid-type depressants?

14 **A. Yes.**

15 **Q.** As opposed to the ones that get you
16 excited, for want of a better term?

17 **A. Yes.**

18 **Q.** Did he ever seek any treatment
19 for --

20 **A. Oh, yes. Yes, he did. And then**
21 **he'd go to meetings sometimes. I mean, he**
22 **wanted to live a good life, a clean life. John**
23 **was a good person.**

24 **Of course I'm going to sound**
25 **prejudiced because I'm his mother, but he was a**
AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

26

1 J. Lawniczak - by Mr. Bacharach
2 **good man. He'd -- would help anyone out and**
3 **take food out of his refrigerator, out of his**
4 **mouth. I mean -- all right, don't go into**
5 **Lent, but John -- John was a good person. He**
6 **would help anybody. He was a good man.**

7 **Q.** But he did seek treatment on a
8 number of occasions?

9 **A. Yes.**

10 **Q.** Do you know any of the places where
11 he, and I'm not necessarily going to go back
12 ten years, but say within the last five years
13 where he had sought any treatment?

14 **A. He went away one time. I don't know**
15 **if it was Cove Forge. I think it was Cove**
16 **Forge.**

17 **Q.** Okay.

18 **A. But I'm not sure quite when.**

19 **Q.** Was any of the treatment inpatient
20 treatment?

21 **A. Yes, he stayed there.**

22 **Q.** And you indicated also go to AA
23 meetings?

24 **A. Uh-huh.**

25 **Q.** Were there times when he would just
AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
2 not do that and sort of, for want of a better
3 term, fall off the wagon and not get any
4 treatment and so forth?
5 **A. Sure. Yeah. He'd get discouraged,**
6 **and I guess with his mental health issues, his**
7 **mind would take over, and think things aren't**
8 **going to get any better and, you know.**

9 **Q.** Do you know what treatment, if any,
10 he got within a year prior to March of 2016?

11 **A. Treatment, no.**

12 **Q.** Do you know, was he getting
13 treatment during that period of time, any
14 treatment to your knowledge?

15 **A. To my knowledge, no.**

16 **Q.** He was, I guess -- the arrest that
17 put him in the Allegheny County Jail, had you
18 seen him, you know, around that time, within a
19 few days of that?

20 **A. Uh-huh.**

21 **Q.** How was he then?

22 **A. Fine.**

23 **Q.** He didn't seem unusually depressed
24 or anything?

25 **A. No, because he was on his meds. He**
AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

28

1 J. Lawniczak - by Mr. Bacharach
2 **was taking his medication.**

3 **Q.** So that was sort of the, if he took
4 his meds it was he --

5 **A. He'd do pretty good.**

6 **Q.** -- would be okay?

7 **A. Uh-huh.**

8 **Q.** And if he didn't, he might -- he
9 regressed, correct?

10 **A. Yes. Sometimes, yes.**

11 **Q.** But you think at least -- strike
12 that.

13 When was it -- do you remember when
14 the last time you would have actually
15 physically seen John prior to him being
16 arrested in March of '16?

17 **A. That was on a Thursday, right? Or a**
18 **Wednesday?**

19 **Monday, because we always got**
20 **together every Monday. That was my day off.**

21 **Q.** Okay.

22 **A. Taking him shopping or go get**
23 **something to eat.**

24 **Q.** But he seemed in pretty good spirits
25 and so forth when you last saw him?

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach

2 **A. Uh-huh. Yes, he did.**

3 **Q.** Did you physically, did you go down
4 and visit him physically when he was in the
5 Allegheny County Jail in March of 2016? Did
6 you ever go down?

7 **A. No, because they picked him up on**
8 **a -- I don't know if it was a Wednesday or a**
9 **Thursday, and he did that on a Tuesday. And I**
10 **was in the process of trying -- I told him,**
11 **with our phone conversations, contacting bail**
12 **bondsman, trying to get that together, but I**
13 **worked every day too.**

14 **Q.** I gather you did speak to him on the
15 phone?

16 **A. Yes.**

17 **Q.** About how many times?

18 **A. I'm not sure.**

19 **Q.** Do you remember what he said?

20 **A. That he couldn't take it in there.**
21 **They didn't have him on medication. I mean, I**
22 **don't know how long you have to be there before**
23 **they put you on your meds, your psych meds,**
24 **whatnot, but okay.**

25 **How often did I talk to him, was**

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

30

1 J. Lawniczak - by Mr. Bacharach

2 **that the question you asked me?**

3 **Q.** Yes. Well, it was how often did you
4 talk to him. That's the first question.

5 **A. Probably three or four times.**

6 **Q.** And again, what do you recall him
7 telling you? You said he couldn't take it.

8 **A. I told him I was working on getting**
9 **him out, you know, that he had to wait for --**
10 **who are those people called in there?**

11 **Q.** Behavior Clinic.

12 **A. Behavior Clinic person to see him**
13 **before I could get him out, and I just kept**
14 **trying to keep him, you know, "You're going to**
15 **get out, John. It's just, you know, they have**
16 **to -- you have to see the Behavior Health**
17 **person first." And he let me know, you know,**
18 **if he was being moved to like a -- he told me**
19 **they were taking him up to 5-F, the floor where**
20 **you're to be watched.**

21 **Q.** Did he ever say to you that he was
22 going to injure himself or hurt himself?

23 **A. Yes.**

24 **Q.** As best you can recall, what did he
25 say?

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach

2 **A. "I can't take it in here, Mom. I'm**
3 **not going to make it in here, Mom."**

4 **Q.** Did he specify particularly what was
5 bothering him, why he couldn't take it?

6 **A. Well, being tasered in the throat**
7 **would be one of them, you know, when you're**
8 **already going through a lot of things in your**
9 **head, hardly able to speak.**

10 **Q.** Did he tell you he had been tasered?

11 **A. Yes, he was tasered by a guard**
12 **there, a guard that said some rotten things to**
13 **him. So, in turn, John went toward him and he**
14 **tasered him in the throat.**

15 **Q.** Do you know the name of the guard?
16 Did he tell you?

17 **A. DiPaul.**

18 **Q.** And when did he tell you that? I
19 mean, in terms of when he got to the jail, was
20 that the first call? The last call? Anything
21 like that?

22 **A. Probably the second call.**

23 **Q.** Other than the taser incident, did
24 he tell you anybody else was mistreating him
25 there?

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

32

1 J. Lawniczak - by Mr. Bacharach

2 **A. No.**

3 **Q.** You know, I have access to the
4 records at the jail, and I can see that -- I
5 mean, John was there a lot of different
6 times --

7 **A. Uh-huh.**

8 **Q.** -- although mostly it seems for
9 relatively short periods of time, a few days or
10 a week?

11 **A. For petty things too. Also nothing**
12 **major, terroristic threats. He was drunk**
13 **Downtown with a buddy, throwing a garbage can**
14 **and arguing, terroristic threat.**

15 **Q.** Yeah, but it seems like, just
16 looking through, there was -- like the first
17 one I saw was 1996 or 1997. That was actually
18 the terroristic threats one.

19 **A. Uh-huh.**

20 **Q.** And then there were some other. It
21 was '97. These are rough dates, date, '99,
22 2000.

23 **A. Can you tell me what they were -- I**
24 **mean, you know, when you're naming the years --**

25 **Q.** Sure I can tell you some.

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **A. -- what the charge was?**
 3 **Q.** And these dates are -- I'm just
 4 going by docket numbers, but the event may have
 5 taken place --
 6 **A. Okay.**
 7 **Q.** Was '97 was, I know happened in '96
 8 was the terroristic threats.
 9 **A. Uh-huh.**
 10 **Q.** Another '97, it was a DUI and a
 11 disorderly conduct. '99 there was a
 12 possession, a drug possession charge. 2001,
 13 again, it was possession of an instrument of a
 14 crime, criminal mischief-type case. 2004 there
 15 was a burglary, criminal conspiracy. I'm not
 16 even -- some of these -- I'm not saying all
 17 these charges were resulted in conviction, but
 18 that's -- I'm telling you what the initial
 19 charges were.
 20 **A. Okay.**
 21 **Q.** Then 2005 it was another possession
 22 of a controlled substance, drugs, and 2007 was
 23 terroristic threats, recklessly endangering.
 24 You know, it seemed like there were a whole
 25 bunch in that period, and then there's like a
AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

34

1 J. Lawniczak - by Mr. Bacharach
 2 six or seven year gap after that where nothing
 3 happened. I don't see anything. And then 2014
 4 there's another one, relatively minor. It's a
 5 DC, disorderly conduct and drug possession.
 6 There's actually two in that year.
 7 And it seemed like there was this
 8 period of time of six or seven years when
 9 nothing happened. Was there something that was
 10 going on then, I mean, that you're aware of or
 11 why that would have occurred?
 12 **A. No, not that I'm aware of.**
 13 **Q.** It just -- I just noticed that sort
 14 of big gap there.
 15 **A. Uh-huh.**
 16 **Q.** I didn't know whether he was like
 17 hospitalized or -- was he ever out of the
 18 county or the state for any extended period?
 19 **A. Just that one time when he went to**
 20 **Cove Forge.**
 21 **Q.** The other times that he had been in
 22 jail, to the best of your knowledge, did he
 23 ever attempt to injure himself or harm himself?
 24 **A. No. Well, he -- if you'll be able**
 25 **to look and see yourself, a couple times with**
AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **his mental health issues, he was on the floor**
 3 **5-D, the mental health floor.**
 4 **Q.** Uh-huh.
 5 **A. Whereas they did watch him then, I**
 6 **guess.**
 7 **Q.** Okay. I saw sometimes, he
 8 occasionally was. But as far as -- but he had
 9 never actually in the prior times attempted to
 10 injure himself, to the best of your knowledge?
 11 **A. No. To the best of my knowledge,**
 12 **no.**
 13 **Q.** Did he ever say that to you, that he
 14 was going to do that when he was in the jail
 15 during any of those prior occasions?
 16 **A. No.**
 17 **Q.** Just a few more questions. We're
 18 almost done.
 19 While John was in the
 20 Allegheny County Jail in March of '16, or after
 21 he passed away, during that period of time, did
 22 you ever speak to anyone at the
 23 Allegheny County Jail who you believe was
 24 associated with Allegheny County regarding what
 25 had happened with John?
AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

36

1 J. Lawniczak - by Mr. Bacharach
 2 **A. Yeah, a few people called me the day**
 3 **he died -- not died -- he died in the hospital.**
 4 **Q.** Yes.
 5 **A. The day that that happened, I was at**
 6 **work and I don't get home until 3 o'clock. And**
 7 **when I come home, there was a number of phone**
 8 **calls, the Behavioral Health guy, Deputy**
 9 **Wainwright, the chaplain or something.**
 10 **Q.** Uh-huh.
 11 **A. There was a few phones that day but,**
 12 **you know, they all went to my voicemail. And**
 13 **when I come home, of course, it was too late.**
 14 **You know, it was -- to try to get ahold, and I**
 15 **kept trying to call and call and get ahold of**
 16 **people all night.**
 17 **It was so hard to get in to see him.**
 18 **The next day when he was in the hospital, they**
 19 **had a sheriff, like he was this big time**
 20 **criminal. They had sheriffs on him, and I had**
 21 **to wait for him to be cleared -- for it to be**
 22 **cleared for me to get in to see him, because I**
 23 **knew it was bad, and I knew he was bad. But I**
 24 **still, subconsciously in my head, I thought he**
 25 **was going to be okay, that, you know, it would**
AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 **be spend a lot of time in the hospital, but**
 3 **he'd get over -- come out of it and that, until**
 4 **I knew that -- until they told me he was**
 5 **brain-dead.**

6 **And there, see how I went that far**
 7 **off to answer whatever I was going to say.**

8 **Q.** Don't worry about it.

9 **A.** **But the next day then, I did speak**
 10 **to Deputy Wainwright. And he did -- he's a**
 11 **soft-spoken guy. I mean, that's what I**
 12 **remembered, that his voice was soft-spoken.**
 13 **And he stated to me -- well, so many words,**
 14 **term, however, apparently we don't have -- we**
 15 **wish we had more help than what we have,**
 16 **because I said to him, "Wait a minute. He was**
 17 **on 5. How could something like that happen?"**
 18 **And he pretty much stated that, and I'm under**
 19 **oath and I'm telling the truth -- I would never**
 20 **lie anyway, stated that, you know, not having**
 21 **enough help there, manpower.**

22 **Q.** Just as close as you can, can you
 23 just tell me what you recall he said in his
 24 words about that? If that's the best you can
 25 do, that's fine.

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

38

1 J. Lawniczak - by Mr. Bacharach
 2 **A.** **"I'm sorry for your loss. John hung**
 3 **hissself." I said, "Well, how could that**
 4 **happen? You know, you're supposed to be**
 5 **watching him." And he said something to the**
 6 **terms, "Well apparently," you know, "we wish we**
 7 **had more manpower than what we do." That's all**
 8 **I remember.**

9 **Q.** Did he call you?

10 **A.** **Yeah, he called me back because I**
 11 **kept calling, and calling.**

12 **Q.** Other than actually speaking with
 13 the deputy warden, did you speak to anyone else
 14 that you think was associated with the jail
 15 about this incident?

16 **A.** **No.**

17 **Q.** Other than people who work at the
 18 jail, are you aware of any one who has any
 19 knowledge about the events that took place in
 20 March of 2016?

21 **A.** **When you say some things, then**
 22 **that's like terms, that's considered hearsay,**
 23 **right? I mean, so why even say it, you know,**
 24 **what you hear and what you -- you know.**

25 **Q.** I'm not talking about just sort of

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 J. Lawniczak - by Mr. Bacharach
 2 rumors but, I mean, if somebody who you think
 3 has some actual knowledge of what takes place
 4 at the jail, have you spoken to anyone like
 5 that?

6 **A.** **I haven't personally, no.**

7 **Q.** Other than what we've talked about
 8 here today, do you have any knowledge related
 9 to what happened to John in March of 2016? And
 10 I'm excluding anything that your attorneys may
 11 have said to you. But other than what your
 12 attorneys have told you, is there anything that
 13 you know about what happened to John and what
 14 caused his death that we haven't talked about?

15 **A.** **No. My whole thing is that I don't**
 16 **believe they were checking on him like they**
 17 **said they were, because you can't do it that**
 18 **quick. I mean, that's my opinion.**

19 **See, I have mixed emotions, sad,**
 20 **angry, you know. No disrespect to you, but**
 21 **it's just...**

22 **Q.** Believe me, I --

23 **A.** **I don't believe.**

24 **Q.** I can't really appreciate what
 25 you're going through.

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

40

1 J. Lawniczak - by Mr. Bacharach

2 **A.** **Do you have children?**

3 **Q.** I do. That's what I'm saying. I
 4 can't really, you know, but that's not the kind
 5 of thing --

6 **A.** **It's horrific, horrific, horrific**
 7 **when it's your child, because no matter what, a**
 8 **grown man, whatnot, it's your child.**

9 **Q.** I agree.

10 **A.** **I miss him so much.**

11 MR. BACHARACH: I think I'm
 12 done. Just give me one second.

13 MR. TERZIGNI: Okay. No
 14 problem.

15 (Short break.)

16 MR. BACHARACH: I don't have
 17 any other questions. Thank you. I thank you
 18 for coming down. Again, I apologize. I know
 19 this is a traumatic thing to do, but
 20 unfortunately I have to do it.

21 MR. TERZIGNI: Thanks John.
 22 We'll read.

23 - - - - -

24

25

AMENT & AMENT
 Court Reporting, LLC - Phone 412-793-6152

1 (Signature not waived.)
 2 (There being no further
 3 questions, the deposition concluded at 11:05 a.m.)
 4 -----
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

AMENT & AMENT COURT REPORTING, LLC
 412-793-6152

1 DEPOSITION ERRATA SHEET
 2 Page No.____Line No.____Change to:____
 3 _____
 4 Reason for change:_____
 5 Page No.____Line No.____Change to:____
 6 _____
 7 Reason for change:_____
 8 Page No.____Line No.____Change to:____
 9 _____
 10 Reason for change:_____
 11 Page No.____Line No.____Change to:____
 12 _____
 13 Reason for change:_____
 14 Page No.____Line No.____Change to:____
 15 _____
 16 Reason for change:_____
 17 Page No.____Line No.____Change to:____
 18 _____
 19 Reason for change:_____
 20 Page No.____Line No.____Change to:____
 21 _____
 22 Reason for change:_____
 23 _____
 24 SIGNATURE:_____DATE:_____
 JEAN LAWNICZAK

AMENT & AMENT COURT REPORTING, LLC
 412-793-6152

42

1 DEPOSITION ERRATA SHEET
 2
 3 OUR ASSIGNMENT NO.: 8-04719
 4 CASE CAPTION: JEAN LAWNICZAK, et al.
 5 vs.
 6 ALLEGHENY COUNTY, et al.
 7
 8 **DECLARATION UNDER PENALTY OF PERJURY**
 9 ***I declare under penalty of perjury***
 10 that I have read the entire transcript of my
 11 Deposition taken in the captioned matter or the
 12 same has been read to me, and the same is true
 13 and accurate, save and except for changes
 14 and/or corrections, if any, as indicated by me
 15 on the **DEPOSITION ERRATA SHEET** hereof, with the
 16 understanding that I offer these changes as if
 17 still under oath. In all other respects the
 18 transcript is true and correct.
 19

JEAN LAWNICZAK

Subscribed and sworn to before me this

_____ day of _____, 2018.

Notary Public

AMENT & AMENT COURT REPORTING, LLC
 412-793-6152

44

1 DEPOSITION ERRATA SHEET
 2 Page No.____Line No.____Change to:____
 3 _____
 4 Reason for change:_____
 5 Page No.____Line No.____Change to:____
 6 _____
 7 Reason for change:_____
 8 Page No.____Line No.____Change to:____
 9 _____
 10 Reason for change:_____
 11 Page No.____Line No.____Change to:____
 12 _____
 13 Reason for change:_____
 14 Page No.____Line No.____Change to:____
 15 _____
 16 Reason for change:_____
 17 Page No.____Line No.____Change to:____
 18 _____
 19 Reason for change:_____
 20 Page No.____Line No.____Change to:____
 21 _____
 22 Reason for change:_____
 23 _____
 24 SIGNATURE:_____DATE:_____
 JEAN LAWNICZAK

AMENT & AMENT COURT REPORTING, LLC
 412-793-6152

1
2 COMMONWEALTH OF PENNSYLVANIA)
3 COUNTY OF ALLEGHENY)

4 I, Diane G. Galvin, a notary public in
5 and for the Commonwealth of Pennsylvania, do
6 hereby certify that the witness, Jean Lawniczak,
7 was by me first duly sworn to testify the
8 truth; the whole truth, and nothing but the
9 truth; that the foregoing deposition was taken
10 at the time and place stated herein; and that
11 the said deposition was recorded
12 stenographically by me and then reduced to
13 typewriting under my direction, and constitutes
14 a true record of the testimony given by said
15 witness, all to the best of my skill and
16 ability.

17 I further certify that the inspection,
18 reading and signing of said deposition were not
19 waived by counsel for the respective parties
20 and by the witness and if after 30 days the
21 transcript has not been signed by said witness
22 that the witness received notification and has
23 failed to respond and the deposition may then
24 be used as though signed.

25 I further certify that I am not a
relative, or employee of either counsel, and
that I am in no way interested, directly or
indirectly, in this action.

IN WITNESS WHEREOF, I have hereunto
set my hand and affixed my seal of office this
6th day of February, 2018.

S/DIANE G. GALVIN

AMENT & AMENT

Court Reporting, LLC - Phone 412-793-6152

\$	350-1150 [1] - 2:22	42:5, 45:2 Allegheny [8] - 2:8, 2:19, 4:13, 27:17, 29:5, 35:20, 35:23, 35:24 almost [2] - 18:22, 35:18 angry [1] - 39:20 answer [3] - 5:2, 5:7, 37:7 anyway [1] - 37:20 apartment [1] - 8:17 apologize [2] - 20:9, 40:19 appear [1] - 15:18 appreciate [1] - 39:24 area [2] - 8:14, 21:24 arguing [1] - 32:14 arrest [1] - 27:16 arrested [1] - 28:16 arrests [1] - 24:7 art [1] - 21:22 Art [1] - 21:23 aside [1] - 24:25 ASSIGNMENT [1] - 42:3 assist [1] - 14:18 associated [2] - 35:24, 38:14 attempt [3] - 20:19, 20:25, 34:23 attempted [2] - 19:5, 35:9 attorney [3] - 4:15, 4:23, 14:18 attorneys [2] - 39:10, 39:12 AUTHORIZATION [1] - 1:23 aware [9] - 15:5, 15:21, 22:21, 24:3, 24:4, 25:6, 34:10, 34:12, 38:18 awareness [1] - 24:16	beautiful [1] - 6:24 behavior [2] - 30:11, 30:12 Behavior [1] - 30:16 Behavioral [1] - 36:8 best [6] - 30:24, 34:22, 35:10, 35:11, 37:24, 45:9 better [3] - 25:16, 27:2, 27:8 big [2] - 34:14, 36:19 biracial [1] - 13:8 blood [1] - 13:4 bondsman [1] - 29:12 born [3] - 7:10, 10:25, 13:25 bothering [1] - 31:5 Boulevard [2] - 2:9, 2:21 brain [1] - 37:5 brain-dead [1] - 37:5 break [3] - 4:22, 5:3, 20:2 brief [2] - 5:19, 40:15 buddy [1] - 32:13 Building [1] - 2:20 bunch [1] - 33:25 burglary [1] - 33:15 busy [1] - 12:7 BY [2] - 3:7, 4:8	chaplain [1] - 36:9 charge [2] - 33:2, 33:12 charges [2] - 33:17, 33:19 check [1] - 14:2 checking [1] - 39:16 child [7] - 7:18, 7:19, 7:25, 10:6, 12:24, 40:7, 40:8 children [3] - 7:15, 7:16, 40:2 chronic [1] - 15:2 City [1] - 22:11 Civil [2] - 1:6, 2:5 clean [2] - 6:22, 25:22 cleaning [1] - 6:23 cleared [2] - 36:21, 36:22 Clinic [2] - 30:11, 30:12 close [5] - 11:12, 18:12, 18:16, 37:22 coat [1] - 11:17 cold [1] - 14:23 coming [1] - 40:19 Commons [1] - 2:20 Commonwealth [2] - 2:8, 45:4 COMMONWEALTH [1] - 45:2 concluded [1] - 41:3 condition [1] - 17:12 conditions [1] - 15:2 conduct [2] - 33:11, 34:5 considered [2] - 11:8, 38:22 conspiracy [1] - 33:15 constitutes [1] - 45:8 contacting [1] - 29:11 controlled [1] - 33:22 conversations [1] - 29:11 conviction [1] - 33:17 correct [3] - 10:7, 28:9, 42:17 corrections [1] - 42:13 COUNSEL [1] - 2:13 counsel [2] - 45:12, 45:16 county [1] - 34:18 COUNTY [3] - 1:9, 42:5, 45:2 County [8] - 2:9, 2:19, 4:13, 27:17, 29:5, 35:20, 35:23, 35:24 couple [8] - 14:24, 17:19, 17:25, 18:4, 18:6, 18:21, 18:23,
\$200 [1] - 13:23	4			
'	4 [1] - 3:7 412 [3] - 2:17, 2:22, 12:16 412-290 [1] - 12:13 445 [2] - 2:9, 2:21			
'16 [2] - 28:16, 35:20 '75 [1] - 7:10 '96 [1] - 33:7 '97 [3] - 32:21, 33:7, 33:10 '99 [2] - 32:21, 33:11	5			
	5 [2] - 22:8, 37:17 5-D [1] - 35:3 5-F [1] - 30:19			
1	6			
10:01 [1] - 2:11 11:05 [1] - 41:3 12th [1] - 6:17 15 [1] - 13:3 15201 [1] - 6:2 15219 [1] - 2:21 15222 [1] - 2:16 1535 [1] - 5:25 16 [1] - 13:3 1700 [1] - 2:16 1989 [1] - 7:23 1996 [1] - 32:17 1997 [1] - 32:17	6th [1] - 45:19			
	8			
	8-04719 [1] - 42:3			
	9			
	9th [1] - 10:25			
2	A		C	
20 [1] - 15:20 2000 [1] - 32:22 2001 [1] - 33:12 2004 [1] - 33:14 2005 [1] - 33:21 2007 [1] - 33:22 2008 [1] - 10:25 2014 [1] - 34:3 2016 [4] - 27:10, 29:5, 38:20, 39:9 2018 [4] - 1:16, 2:11, 42:22, 45:19 21 [1] - 7:23 26 [2] - 1:16, 2:11 281-9194 [1] - 2:17 29 [1] - 19:4 290-6203 [1] - 12:16 2:17-cv-00185 [1] - 1:6	a.m [2] - 2:11, 41:3 AA [1] - 26:22 ability [1] - 45:10 able [2] - 31:9, 34:24 accept [1] - 18:14 access [1] - 32:3 accurate [1] - 42:12 action [1] - 45:17 Action [1] - 1:6 actual [1] - 39:3 addicted [1] - 24:14 address [2] - 5:25, 11:10 admitted [1] - 20:16 affecting [1] - 5:15 affixed [1] - 45:18 age [1] - 8:8 AGENCY [1] - 1:23 ago [4] - 12:24, 14:16, 14:17, 20:14 agree [1] - 40:9 ahold [2] - 36:14, 36:15 al [3] - 1:9, 42:4, 42:5 Alco [1] - 6:8 Allderice [1] - 8:25 ALLEGHENY [3] - 1:9,		CAPTION [1] - 42:4 captioned [1] - 42:10 care [1] - 7:8 case [1] - 33:14 CASE [1] - 42:4 cash [2] - 14:2, 14:3 caused [1] - 39:14 Center [2] - 2:16, 6:16 Certified [1] - 2:6 certify [3] - 45:5, 45:11, 45:15 CERTIFYING [1] - 1:23 Change [14] - 43:2, 43:5, 43:8, 43:11, 43:14, 43:17, 43:20, 44:2, 44:5, 44:8, 44:11, 44:14, 44:17, 44:20 change [14] - 43:4, 43:7, 43:10, 43:13, 43:16, 43:19, 43:22, 44:4, 44:7, 44:10, 44:13, 44:16, 44:19, 44:22 changes [2] - 42:12, 42:15	
		B		
3 [1] - 36:6 30 [1] - 45:12 300 [2] - 2:10, 2:20 34 [1] - 6:12		baby [1] - 13:8 BACHARACH [5] - 2:20, 3:7, 4:8, 40:11, 40:17 Bacharach [1] - 4:12 bad [3] - 5:20, 36:23 bag [1] - 21:12 bail [1] - 29:11 ballpark [1] - 7:8 basic [1] - 4:16 bathroom [3] - 19:20, 19:24, 20:17 beat [1] - 13:24		

<p>34:25 course [3] - 11:21, 25:24, 36:13 court [3] - 5:6, 5:10, 13:23 COURT [1] - 1:2 Cove [3] - 26:15, 34:20 coverage [1] - 16:10 Coxon [2] - 10:17, 10:20 COXON [1] - 10:18 crime [1] - 33:14 criminal [3] - 33:14, 33:15, 36:20 current [2] - 7:21, 12:19</p>	<p>9:23, 15:8, 16:6, 17:16, 32:5 differently [1] - 23:22 DiPaul [1] - 31:17 direction [1] - 45:8 directly [1] - 45:16 Disability [3] - 14:8, 14:11, 14:19 discouraged [1] - 27:5 disorderly [2] - 33:11, 34:5 disrespect [1] - 39:20 DISTRIBUTION [1] - 1:22 DISTRICT [2] - 1:2, 1:2 docket [1] - 33:4 done [2] - 35:18, 40:12 down [4] - 5:11, 29:3, 29:6, 40:19 Downtown [1] - 32:13 Drive [1] - 5:25 drug [2] - 33:12, 34:5 drugs [7] - 24:14, 24:15, 24:25, 25:2, 25:4, 25:12, 33:22 drunk [1] - 32:12 DUI [1] - 33:10 duly [2] - 4:5, 45:5 during [3] - 27:13, 35:15, 35:21</p>	<p>ESQUIRE [2] - 2:15, 2:20 ESTATE [1] - 1:5 estimate [1] - 18:7 et [3] - 1:9, 42:4, 42:5 Etna [1] - 8:15 event [5] - 15:23, 15:24, 20:11, 23:24, 33:4 events [2] - 19:14, 38:19 eventually [1] - 9:6 everyday [1] - 18:19 exact [1] - 7:8 EXAMINATION [1] - 4:7 examination [1] - 2:4 examined [1] - 4:6 example [3] - 15:23, 24:6, 25:7 except [1] - 42:12 exceptionally [1] - 18:12 excited [1] - 25:16 excluding [1] - 39:10 EXHIBITS [1] - 3:12 existed [1] - 24:19 explain [1] - 13:4 extended [1] - 34:18</p>	<p>FOR [1] - 1:2 foregoing [1] - 45:6 Forge [3] - 26:15, 26:16, 34:20 forgot [1] - 9:11 Fort [3] - 2:9, 2:20, 2:21 forth [3] - 24:7, 27:4, 28:25 FORWARDING [1] - 1:22 four [2] - 7:13, 30:5 four-and-a-half [1] - 7:13 free [2] - 4:24, 20:3 frequently [1] - 18:18 Friday [2] - 1:15, 2:10 FROM [1] - 1:23 full [1] - 4:9</p>	<p>heads [1] - 5:8 Health [2] - 30:16, 36:8 health [14] - 10:3, 14:21, 15:2, 15:12, 15:13, 15:15, 16:10, 17:3, 17:12, 21:15, 23:23, 27:6, 35:2, 35:3 hear [1] - 38:24 hearing [1] - 5:16 hearsay [1] - 38:22 heart [2] - 11:10, 11:22 Heights [1] - 5:24 Heinz [1] - 6:16 held [1] - 40:16 help [5] - 19:16, 26:2, 26:6, 37:15, 37:21 hereby [1] - 45:5 herein [3] - 2:3, 4:5, 45:7 hereof [1] - 42:14 hereunto [1] - 45:18 heroin [2] - 25:4, 25:5 high [3] - 8:18, 8:23, 9:18 himself [11] - 19:6, 20:15, 20:19, 21:3, 22:22, 23:2, 30:22, 34:23, 35:10 hissself [2] - 19:23, 38:3 History [1] - 6:16 home [3] - 36:6, 36:7, 36:13 horrific [3] - 40:6 hospital [7] - 19:16, 19:17, 22:14, 22:16, 36:3, 36:18, 37:2 hospitalized [5] - 17:11, 18:3, 20:21, 20:23, 34:17 hospitals [1] - 17:20 house [1] - 8:5 housekeeping [1] - 6:20 hung [1] - 38:2 hurt [3] - 23:2, 23:3, 30:22 husband [5] - 6:4, 7:14, 7:22, 13:20, 21:20 husband's [1] - 21:19</p>	
<p>D</p>			<p>G</p>		
<p>daily [2] - 18:9, 18:10 DATE [2] - 43:24, 44:24 date [4] - 7:9, 14:13, 14:15, 32:21 dates [2] - 32:21, 33:3 days [3] - 27:19, 32:9, 45:12 DC [1] - 34:5 dead [1] - 37:5 death [1] - 39:14 Deceased [1] - 1:6 December [1] - 10:25 DECLARATION [1] - 42:7 declare [1] - 42:8 defendants [1] - 4:14 Defendants [3] - 1:10, 2:3, 2:18 demand [1] - 8:21 Department [2] - 2:9, 2:19 DEPOSITION [6] - 1:13, 2:2, 42:1, 42:14, 43:1, 44:1 deposition [5] - 41:3, 45:6, 45:7, 45:11, 45:14 Deposition [1] - 42:10 depressants [1] - 25:13 depressed [2] - 23:20, 27:23 depression [1] - 15:17 Deputy [2] - 36:8, 37:10 deputy [1] - 38:13 Diane [2] - 2:6, 45:4 died [3] - 36:3 different [6] - 9:21,</p>	<p>E</p>	<p>failed [1] - 45:14 fall [1] - 27:3 far [3] - 15:10, 35:8, 37:6 father [4] - 7:3, 12:23, 13:8, 21:20 February [1] - 45:19 Federal [1] - 2:4 fell [1] - 14:24 few [9] - 4:16, 9:25, 15:8, 16:6, 27:19, 32:9, 35:17, 36:2, 36:11 fighting [1] - 21:11 filed [1] - 4:14 fine [3] - 12:12, 27:22, 37:25 first [8] - 4:5, 15:18, 21:14, 30:4, 30:17, 31:20, 32:16, 45:5 five [5] - 14:16, 20:14, 23:14, 23:15, 26:12 flip [1] - 12:10 flip-top [1] - 12:10 floor [3] - 30:19, 35:2, 35:3 follows [1] - 4:6 food [1] - 26:3</p>	<p>GALVIN [1] - 45:20 Galvin [2] - 2:6, 45:4 gap [2] - 34:2, 34:14 garbage [1] - 32:13 Gateway [1] - 2:16 gather [1] - 29:14 GED [3] - 8:21, 8:22, 9:7 geez [1] - 7:6 girl [1] - 12:23 given [1] - 45:9 grade [2] - 9:3, 9:5 graduate [1] - 8:18 ground [1] - 4:16 grown [1] - 40:8 guard [3] - 31:11, 31:12, 31:15 guards [2] - 19:20, 20:17 guess [5] - 13:2, 23:12, 27:6, 27:16, 35:6 guessing [1] - 23:11 guy [2] - 36:8, 37:11</p>	<p>H</p>	
			<p>half [1] - 7:13 hand [1] - 45:18 handle [1] - 23:22 hang [1] - 20:19 hanging [1] - 19:23 hard [5] - 8:9, 17:15, 18:13, 22:24, 36:17 hardly [1] - 31:9 harm [1] - 34:23 head [4] - 21:12, 23:20, 31:9, 36:24</p>		
				<p>I</p>	
				<p>idea [3] - 18:2, 19:13, 24:24 illegal [2] - 24:14,</p>	

<p>24:24 important [1] - 5:6 IN [2] - 1:2, 45:18 incident [6] - 19:4, 21:6, 22:10, 31:23, 38:15 incidents [1] - 22:20 indicated [2] - 26:22, 42:13 indication [1] - 24:12 indirectly [1] - 45:17 informal [1] - 4:20 initial [1] - 33:18 injure [5] - 19:6, 22:22, 30:22, 34:23, 35:10 injured [1] - 21:3 injuries [1] - 20:22 inpatient [1] - 26:19 inside [1] - 23:19 inspection [1] - 45:11 instrument [1] - 33:13 insurance [1] - 16:10 intending [1] - 22:25 interested [1] - 45:16 IS [1] - 1:22 issues [5] - 10:3, 21:15, 23:23, 27:6, 35:2 itself [1] - 24:10</p>	<p>John's [1] - 10:3 john.bacharach@alleghenycounty.us [1] - 2:22 Johnny [2] - 12:23, 13:7 just.. [1] - 39:21</p> <p style="text-align: center;">K</p> <p>keep [1] - 30:14 kept [3] - 30:13, 36:15, 38:11 kill [1] - 23:4 kind [1] - 40:4 knowledge [10] - 12:17, 19:5, 27:14, 27:15, 34:22, 35:10, 35:11, 38:19, 39:3, 39:8 knows [1] - 11:23</p> <p style="text-align: center;">L</p> <p>landscaping [1] - 9:23 last [13] - 8:11, 8:13, 10:4, 10:5, 10:15, 14:16, 18:2, 18:5, 26:12, 28:14, 28:25, 31:20 late [1] - 36:13 Law [3] - 2:9, 2:15, 2:19 LAWNICZAK [9] - 1:4, 1:13, 2:2, 3:3, 4:4, 42:4, 42:19, 43:24, 44:24 Lawniczak [5] - 4:11, 4:12, 7:22, 21:22, 45:5 lawsuit [1] - 4:14 least [4] - 10:6, 14:17, 16:21, 28:11 leave [1] - 9:2 left [1] - 9:18 Lent [1] - 26:5 Liberty [1] - 22:9 lie [1] - 37:20 life [4] - 15:23, 15:24, 25:22 line [1] - 5:10 Line [14] - 43:2, 43:5, 43:8, 43:11, 43:14, 43:17, 43:20, 44:2, 44:5, 44:8, 44:11, 44:14, 44:17, 44:20 live [6] - 5:24, 6:3, 11:7, 11:8, 23:7, 25:22 lived [2] - 7:24, 8:10</p>	<p>lives [1] - 11:5 living [3] - 8:16, 21:23, 21:25 located [1] - 16:9 look [1] - 34:25 looking [2] - 14:14, 32:16 loss [1] - 38:2 Louis [2] - 12:25</p> <p style="text-align: center;">M</p> <p>ma'am [1] - 15:7 maiden [1] - 9:12 mail [1] - 13:17 main [1] - 4:17 major [1] - 32:12 Maloy [4] - 16:8, 16:13, 16:25, 17:7 man [3] - 26:2, 26:6, 40:8 manpower [2] - 37:21, 38:7 March [7] - 19:4, 27:10, 28:16, 29:5, 35:20, 38:20, 39:9 MARKED [1] - 3:12 marriage [1] - 7:5 married [3] - 7:2, 7:11, 13:10 marry [1] - 7:21 MASSIMO [1] - 2:15 matter [2] - 40:7, 42:10 mean [16] - 5:7, 14:12, 14:15, 15:22, 20:21, 25:21, 26:4, 29:21, 31:19, 32:5, 32:24, 34:10, 37:11, 38:23, 39:2, 39:18 means [1] - 13:9 meant [1] - 14:25 Medicaid [1] - 16:11 medication [3] - 5:14, 28:2, 29:21 medications [1] - 15:4 meds [5] - 15:9, 27:25, 28:4, 29:23 meetings [2] - 25:21, 26:23 mental [10] - 10:3, 15:13, 15:15, 17:3, 17:12, 21:15, 23:23, 27:6, 35:2, 35:3 Merrill [1] - 6:8 methamphetamine [1] - 25:7 Michele [1] - 16:8 might [1] - 28:8 military [1] - 13:12</p>	<p>mind [1] - 27:7 minor [1] - 34:4 minute [1] - 37:16 mischief [1] - 33:14 mischief-type [1] - 33:14 miss [2] - 18:14, 40:10 missed [1] - 13:24 mistreating [1] - 31:24 mixed [1] - 39:19 Mom [2] - 31:2, 31:3 mom's [1] - 11:25 Monday [2] - 28:19, 28:20 money [1] - 14:5 month [3] - 13:19, 13:23, 16:21 months [1] - 9:25 mood [1] - 15:17 most [2] - 16:7, 16:13 mostly [1] - 32:8 mother [2] - 13:2, 25:25 mother's [1] - 10:13 mouth [1] - 26:4 move [1] - 8:4 moved [1] - 30:18 moves [1] - 11:13 MR [6] - 3:7, 4:8, 40:11, 40:13, 40:17, 40:22</p> <p style="text-align: center;">N</p> <p>name [14] - 4:9, 4:11, 9:12, 10:11, 10:12, 10:13, 10:15, 10:19, 10:22, 12:20, 12:25, 16:8, 21:21, 31:15 named [1] - 12:24 naming [1] - 32:24 nature [1] - 5:17 necessarily [2] - 14:14, 26:11 need [1] - 4:23 never [6] - 13:24, 25:8, 25:10, 35:9, 37:19 next [2] - 36:18, 37:9 nice [1] - 6:23 night [2] - 18:12, 36:16 nine [2] - 10:24, 10:25 NO [2] - 3:12, 42:3 nobody [1] - 11:23 non [1] - 24:15 non-prescription [1] - 24:15 North [1] - 16:9 Notary [2] - 2:7, 42:24</p>	<p>notary [1] - 45:4 note [1] - 10:6 nothing [4] - 32:11, 34:2, 34:9, 45:6 noticed [1] - 34:13 notification [1] - 45:13 Number [1] - 22:8 number [5] - 11:15, 12:15, 24:6, 26:8, 36:7 numbers [3] - 7:7, 11:23, 33:4</p> <p style="text-align: center;">O</p> <p>o'clock [1] - 36:6 Oakmont [1] - 11:9 oath [2] - 37:19, 42:16 obviously [1] - 7:24 occasionally [1] - 35:8 occasions [2] - 26:8, 35:15 occurred [1] - 34:11 October [1] - 7:23 odds [1] - 9:23 OF [8] - 1:2, 1:5, 1:13, 1:22, 2:2, 42:7, 45:2, 45:2 offer [1] - 42:15 offhand [1] - 17:6 office [2] - 16:9, 45:18 officer [2] - 21:19, 22:5 Offices [1] - 2:15 often [14] - 16:19, 17:14, 17:17, 18:7, 18:17, 19:8, 19:9, 19:10, 23:9, 23:10, 23:13, 23:16, 29:25, 30:3 old [3] - 10:24, 12:10, 15:20 once [6] - 16:21, 17:18, 19:11, 23:13, 23:15 one [17] - 4:17, 8:9, 10:6, 10:9, 12:3, 14:25, 16:7, 19:15, 22:17, 26:14, 31:7, 32:17, 32:18, 34:4, 34:19, 38:18, 40:12 ones [2] - 16:6, 25:15 opinion [1] - 39:18 opioid [1] - 25:13 opioid-type [1] - 25:13 opposed [1] - 25:15 OR [1] - 1:22 order [1] - 13:15 ORLANDO [1] - 1:6</p>
---	---	--	--	--

<p>Orlando [2] - 7:4, 10:20 OUR [1] - 42:3 overwhelmed [1] - 23:21 own [2] - 8:17, 13:19</p>	<p>physically [4] - 21:2, 28:15, 29:3, 29:4 physicians [1] - 16:3 picked [1] - 29:7 Pitt [3] - 2:9, 2:20, 2:21 Pittsburgh [6] - 2:10, 2:16, 2:21, 5:25, 22:8, 22:11 pizza [1] - 9:22 place [7] - 6:21, 6:24, 19:2, 33:5, 38:19, 39:3, 45:7 places [2] - 9:22, 26:10 Plaintiff [4] - 1:7, 2:3, 2:14, 4:5 plastic [1] - 21:12 pocket [1] - 13:20 point [3] - 8:4, 9:6, 21:2 Police [1] - 22:8 police [2] - 21:18, 22:4 possession [5] - 33:12, 33:13, 33:21, 34:5 precipitate [1] - 24:10 precipitated [2] - 15:22, 23:18 prefers [1] - 10:19 prejudiced [1] - 25:25 prescription [3] - 24:15, 24:25, 25:4 PRESENT [1] - 2:13 present [1] - 5:23 presume [3] - 7:24, 11:4, 22:2 pretty [6] - 4:20, 10:2, 16:22, 28:5, 28:24, 37:18 prevent [1] - 5:16 previously [1] - 7:2 problem [4] - 14:22, 15:13, 24:18, 40:14 problems [3] - 15:12, 15:15, 15:22 Procedure [1] - 2:5 proceeding [1] - 4:20 process [1] - 29:10 Professional [1] - 2:6 PROHIBITED [1] - 1:22 prompt [1] - 23:25 psych [2] - 15:9, 29:23 Psych [5] - 17:22, 19:16, 20:16, 22:18, 22:19 psychiatrist [1] - 17:8 psychiatrists [1] - 16:3 psychological [1] -</p>	<p>20:24 psychologist [2] - 17:8, 17:10 psychologists [1] - 16:3 Public [2] - 2:7, 42:24 public [1] - 45:4 pursuant [1] - 2:4 pushed [1] - 19:24 put [3] - 21:12, 27:17, 29:23</p>	<p>37:12 remembering [1] - 5:17 Renee [2] - 12:21 repeat [1] - 4:19 rephrase [1] - 4:19 Reporter [1] - 2:7 reporter [2] - 5:6, 5:10 Representative [1] - 1:5 representing [1] - 4:13 REPRODUCTION [1] - 1:22 required [1] - 20:23 reside [1] - 5:23 resided [1] - 8:11 residing [1] - 8:14 respective [1] - 45:12 respects [1] - 42:16 respond [1] - 45:14 resulted [1] - 33:17 retired [1] - 22:2 ring [1] - 12:8 Ron [2] - 6:4, 6:5 Ronald [1] - 6:6 roofing [1] - 9:22 room [2] - 19:18, 19:25 rotten [1] - 31:12 rough [1] - 32:21 rules [1] - 4:16 Rules [1] - 2:5 rumors [1] - 39:2 Rush [2] - 12:21</p>	<p>37:6, 39:19 seeing [1] - 16:14 seek [2] - 25:18, 26:7 seem [1] - 27:23 set [1] - 45:18 seven [2] - 34:2, 34:8 shake [1] - 5:8 Sharpsburg [1] - 8:15 SHEET [4] - 42:1, 42:14, 43:1, 44:1 sheriff [1] - 36:19 sheriffs [1] - 36:20 shopping [1] - 28:22 short [3] - 9:24, 13:4, 32:9 short-term [1] - 9:24 shoulders [1] - 5:9 shrug [1] - 5:8 Side [1] - 16:9 sign [1] - 13:21 Signature [1] - 41:1 SIGNATURE [2] - 43:24, 44:24 signed [2] - 45:13, 45:14 significant [1] - 15:11 signing [1] - 45:11 Simona [1] - 5:25 situation [2] - 5:20, 21:10 six [3] - 20:14, 34:2, 34:8 skill [1] - 45:9 Smithfield [1] - 6:17 Social [3] - 14:7, 14:10, 14:19 soft [2] - 37:11, 37:12 soft-spoken [2] - 37:11, 37:12 someone [2] - 16:20, 23:22 sometimes [4] - 23:8, 25:21, 28:10, 35:7 son [2] - 7:10, 18:12 son's [2] - 7:3, 12:25 sorry [5] - 7:20, 9:11, 17:5, 22:4, 38:2 sort [4] - 27:2, 28:3, 34:13, 38:25 sought [1] - 26:13 sound [1] - 25:24 speaking [1] - 38:12 specific [1] - 23:24 specify [1] - 31:4 speed [1] - 25:10 spell [1] - 9:14 spend [1] - 37:2 spirits [1] - 28:24 split [1] - 7:14 spoken [3] - 37:11, 37:12, 39:4</p>
<p>P</p> <p>PA [1] - 5:25 PAGE [2] - 3:5, 3:10 Page [14] - 43:2, 43:5, 43:8, 43:11, 43:14, 43:17, 43:20, 44:2, 44:5, 44:8, 44:11, 44:14, 44:17, 44:20 paid [1] - 13:18 painkillers [1] - 25:4 papers [1] - 13:18 Parking [1] - 6:8 particularly [1] - 31:4 parties [1] - 45:12 passed [4] - 13:16, 13:17, 15:6, 35:21 paternity [2] - 13:6, 13:7 pay [2] - 13:15, 14:2 Peabody [2] - 8:24, 8:25 PENALTY [1] - 42:7 penalty [1] - 42:8 pending [1] - 4:25 PENNSYLVANIA [2] - 1:2, 45:2 Pennsylvania [5] - 2:8, 2:10, 2:16, 2:21, 45:4 people [5] - 16:16, 30:10, 36:2, 36:16, 38:17 per [1] - 17:17 period [6] - 8:3, 27:13, 33:25, 34:8, 34:18, 35:21 periods [1] - 32:9 PERJURY [1] - 42:7 perjury [1] - 42:8 person [6] - 12:7, 16:14, 25:23, 26:5, 30:12, 30:17 Personal [1] - 1:5 personally [1] - 39:6 petty [1] - 32:11 phone [6] - 11:23, 12:4, 12:11, 29:11, 29:15, 36:7 phones [1] - 36:11 physical [6] - 14:21, 15:2, 15:3, 15:11, 15:12, 20:22</p>	<p>Q</p> <p>questions [5] - 5:7, 5:16, 35:17, 40:18, 41:3 quick [1] - 39:18 quit [1] - 8:20 quite [2] - 9:20, 26:18</p>	<p>R</p> <p>race [1] - 20:4 read [3] - 40:23, 42:9, 42:11 reading [1] - 45:11 really [2] - 39:24, 40:4 Reason [14] - 43:4, 43:7, 43:10, 43:13, 43:16, 43:19, 43:22, 44:4, 44:7, 44:10, 44:13, 44:16, 44:19, 44:22 reasonably [1] - 11:12 received [2] - 14:6, 45:13 recent [2] - 16:7, 16:14 recess [1] - 40:15 recklessly [1] - 33:23 record [2] - 4:10, 45:9 recorded [1] - 45:7 records [2] - 24:13, 32:4 reduced [1] - 45:8 refrigerator [1] - 26:3 regarding [1] - 35:24 registered [1] - 19:19 regressed [1] - 28:9 regular [1] - 16:22 related [1] - 39:8 relative [1] - 45:16 relatively [2] - 32:9, 34:4 remember [9] - 9:21, 12:14, 14:12, 17:2, 17:6, 21:11, 28:13, 29:19, 38:8 remembered [1] -</p>	<p>S</p> <p>S-W-I-D-O-W-S-K-I [1] - 9:15 S/DIANE [1] - 45:20 sad [1] - 39:19 Sansone [1] - 2:15 save [1] - 42:12 saw [6] - 12:20, 17:3, 18:10, 28:25, 32:17, 35:7 school [4] - 8:18, 8:20, 8:23, 9:18 se [1] - 17:17 seal [1] - 45:18 second [2] - 31:22, 40:12 Security [3] - 14:7, 14:11, 14:19 see [16] - 11:2, 16:19, 18:7, 18:19, 18:20, 18:23, 19:21, 30:12, 30:16, 32:4, 34:3, 34:25, 36:17, 36:22,</p>	

<p>SSI [1] - 14:6 Stabile [1] - 6:9 Stanton [1] - 5:24 start [1] - 14:10 started [1] - 21:14 state [2] - 4:9, 34:18 STATES [1] - 1:2 Station [1] - 22:8 stayed [1] - 26:21 stems [1] - 25:3 stenographically [1] - 45:8 still [5] - 12:2, 21:23, 21:25, 36:24, 42:16 stitches [1] - 14:24 stop [2] - 18:25, 19:3 story [1] - 13:4 street [3] - 11:9, 11:11, 21:11 strike [1] - 28:11 stuff [1] - 20:9 subconsciously [1] - 36:24 Subscribed [1] - 42:21 substance [1] - 33:22 Suite [2] - 2:10, 2:16 support [3] - 13:15, 13:18, 13:19 supposed [1] - 38:4 Swidowski [1] - 9:13 swings [1] - 15:17 sworn [3] - 4:6, 42:21, 45:5</p>	<p>testify [1] - 45:5 testimony [1] - 45:9 tests [2] - 13:5, 13:7 THE [3] - 1:2, 1:2, 1:23 therapist [1] - 17:8 thinking [1] - 24:5 THIS [1] - 1:22 threat [1] - 32:14 threats [4] - 32:12, 32:18, 33:8, 33:23 three [3] - 6:17, 7:11, 30:5 Three [1] - 2:16 throat [2] - 31:6, 31:14 throwing [1] - 32:13 Thursday [2] - 28:17, 29:9 Tiffany [5] - 10:14, 11:5, 11:13, 11:16, 12:17 Tiffany's [1] - 12:15 tired [1] - 4:21 today [2] - 5:15, 39:8 together [2] - 28:20, 29:12 took [4] - 13:2, 22:15, 28:3, 38:19 top [2] - 12:10, 17:2 toward [1] - 31:13 tragic [1] - 15:23 TRANSCRIPT [1] - 1:22 transcript [3] - 42:9, 42:17, 45:13 traumatic [2] - 15:24, 40:20 treated [1] - 16:2 treatment [13] - 16:20, 17:3, 21:15, 25:18, 26:7, 26:13, 26:19, 26:20, 27:4, 27:9, 27:11, 27:13, 27:14 tried [1] - 22:22 true [3] - 42:11, 42:17, 45:9 truth [4] - 37:19, 45:6, 45:6 try [4] - 5:19, 5:21, 18:13, 36:14 trying [6] - 20:15, 21:9, 29:10, 29:12, 30:14, 36:15 Tuesday [1] - 29:9 turn [1] - 31:13 turned [1] - 12:4 twice [2] - 18:21, 19:12 two [2] - 7:11, 34:6 type [2] - 25:13, 33:14 typewriting [1] - 45:8</p>	<p style="text-align: center;">U</p> <p>under [4] - 37:18, 42:8, 42:16, 45:8 UNDER [1] - 42:7 unfortunately [1] - 40:21 UNITED [1] - 1:2 unusually [1] - 27:23 up [4] - 5:3, 7:14, 29:7, 30:19</p> <p style="text-align: center;">V</p> <p>venture [2] - 16:7, 20:13 verbally [1] - 5:7 Verona [1] - 11:9 visit [1] - 29:4 voice [1] - 37:12 voicemail [1] - 36:12 vs [2] - 1:8, 42:4</p> <p style="text-align: center;">W</p> <p>wagon [1] - 27:3 Wainwright [2] - 36:9, 37:10 wait [2] - 30:9, 36:21 Wait [1] - 37:16 waived [2] - 41:1, 45:12 walk [1] - 4:21 warden [1] - 38:13 watch [1] - 35:5 watched [1] - 30:20 watching [1] - 38:5 Wednesday [2] - 28:18, 29:8 week [3] - 18:21, 18:23, 32:10 weeks [2] - 9:25, 17:25 welcome [1] - 9:17 welfare [1] - 13:2 WESTERN [1] - 1:2 western [1] - 17:22 Western [4] - 19:16, 20:16, 22:17, 22:19 whatnot [2] - 29:24, 40:8 whereas [1] - 35:5 WHEREOF [1] - 45:18 whole [3] - 33:24, 39:15, 45:6 wish [2] - 37:15, 38:6 WITHOUT [1] - 1:23 WITNESS [2] - 3:3, 45:18</p>	<p>witness [5] - 45:5, 45:9, 45:12, 45:13, 45:13 words [2] - 37:13, 37:24 works [1] - 6:8 worry [2] - 12:9, 37:8 worse [1] - 5:21</p> <p style="text-align: center;">Y</p> <p>year [6] - 8:8, 9:2, 23:13, 27:10, 34:2, 34:6 years [22] - 6:12, 6:18, 7:11, 8:11, 8:13, 10:24, 12:24, 14:15, 14:17, 15:20, 18:4, 18:6, 20:14, 23:14, 23:15, 24:21, 24:22, 24:23, 26:12, 32:24, 34:8 young [1] - 7:25 yourself [1] - 34:25</p>
<p style="text-align: center;">T</p> <p>taser [1] - 31:23 tasered [4] - 31:6, 31:10, 31:11, 31:14 Taylor [1] - 8:24 telephone [2] - 11:15, 12:15 ten [8] - 8:11, 8:13, 14:15, 14:17, 24:21, 24:22, 24:23, 26:12 tendency [1] - 5:8 tenth [2] - 9:2, 9:4 term [5] - 9:24, 14:25, 25:16, 27:3, 37:14 terms [3] - 31:19, 38:6, 38:22 terroristic [5] - 32:12, 32:14, 32:18, 33:8, 33:23 TERZIGNI [3] - 2:15, 40:13, 40:22 terzignim@gmail.com [1] - 2:17 testified [1] - 4:6</p>			